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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 19-226-RS
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO VACATE</b>
	)	<b>STATUS HEARING ON NOVEMBER 15, 2022</b>
v.	)	<b>AND TO EXCLUDE TIME BETWEEN</b>
	)	<b>NOVEMBER 15, 2022 AND FEBRUARY 13, 2023</b>
LORENZO LEE,	)	
EVAN MARTINEZ-DIAZ,	)	
JESSE LOPEZ, III,	)	
TIMOTHY PEOPLES,	)	
	)	
Defendants.	)	

The parties are continuing work toward negotiated resolutions of these matters. The parties have consulted and agree that there is no need for the scheduled appearance on November 15, 2022. Therefore, the parties hereby stipulate to vacate the status on November 15, 2022 and to exclude time under the Speedy Trial Act for effective preparation of counsel from November 15, 2022 through February 13, 2023 when trial is scheduled to begin. *See* 18 U.S.C. § 3161(h)(7)(A). Failure to exclude time would deny the defendants and defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Undersigned counsel agree that the ends of justice served by ordering this continuance outweigh the best interest of the public and this defendants' right to

**STIPULATION AND ORDER TO VACATE STATUS HEARING ON NOVEMBER 15, 2022  
AND TO EXCLUDE TIME THROUGH FEBRUARY 13, 2023.**

1 a speedy trial and merit the exclusion of time.

2 IT IS SO STIPULATED.

3 DATED: November 14, 2022

4 STEPHANIE M. HINDS  
United States Attorney

5 /s/  
6 DANIEL PASTOR  
Assistant United States Attorney

8 DATED: November 14, 2022

9 /s/  
GAIL SHIFMAN  
Counsel for Defendant Lorenzo Lee

10 DATED: November 14, 2022

11 /s/  
ERICK L. GUZMAN  
Counsel for Defendant Jesse Lopez, III

13 DATED: November 14, 2022

14 /s/  
ARTURO HERNANDEZ  
Counsel for Evan Martinez Diaz

15 DATED: November 14, 2022

16 /s/  
BRIAN BERSON  
Counsel for Defendant Timothy Peoples

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**STIPULATION AND ORDER TO VACATE STATUS HEARING ON NOVEMBER  
15, 2022 AND TO EXCLUDE TIME THROUGH FEBRUARY 13, 2023.**

**ORDER**

Based upon the facts set forth above, the Court finds that exclusion from the time limits applicable under 18 U.S.C. § 3161 (the Speedy Trial Act) for the period from November 15, 2022 through February 13, 2023, is warranted because failure to grant the requested exclusion would unreasonably deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendants in a speedy trial and in the prompt disposition of criminal cases. 18 U.S.C. § 3161(h)(7)(A).

The status conference set for November 15, 2022 is taken off calendar.

DATED: November 14, 2022

  
HON. RICHARD SEEBORG  
Chief United States District Judge